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June 12, 2015

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
United States District Court
Southern District Of New York
40 Foley Square, Room 2203
New York, New York 10007

**Re: Liberty Mutual Fire Insurance Company v. AIG Specialty Insurance
Company, f/k/a Chartis Specialty Insurance Company
Civil Action No. : 15 Civ. 1994 (RA)**

Dear Judge Abrams:

This firm represents plaintiff LIBERTY MUTUAL FIRE INSURANCE COMPANY ("Liberty Mutual") in the above-entitled action. We submit this joint letter motion on behalf of Liberty Mutual and defendant AIG SPECIALTY INSURANCE COMPANY f/k/a Chartis Specialty Insurance Company ("AIG"), for (i) an adjournment of the initial status conference from June 18, 2015, for approximately thirty days; (ii) a concurrent extension of the deadline for submitting the parties' proposed Civil Case Management Plan and Scheduling Order and letter; and (iii) an extension of time for AIG to serve its Answer from June 3, 2015 to July 3, 2015.

Liberty Mutual and AIG continue to make progress with settlement negotiations, but have been unavoidably delayed while waiting for certain necessary documents that were obtained two days ago. Liberty Mutual and AIG wish to dedicate all available resources to finalizing the settlement, which we anticipate doing by the end of the month. We wish to avoid using the time and resources involved in AIG preparing its Answer and the parties and the Court preparing for and attending the Conference if, as anticipated, both become unnecessary due to the resolution of this action.

This is the second request for this relief. The first request was granted. (See Dkt. 8-9.) Counsel for AIG, William Cleary, consents to and joins in this letter motion.

Respectfully Submitted,

JAFFE & ASHER, LLP

By: /s/ David R. Shyer
David R. Shyer, Esq.

DRS/

Hon. Ronnie Abrams, U.S.D.J.

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Cc: William J. Cleary, Esq. (via email only)